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Via e-mail to: [bmoo461@ecy.wa.gov](mailto:bmoo461@ecy.wa.gov)  
Bill Moore  
Industrial Stormwater General Permit  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

September 27, 2004

Dear Mr. Moore:

I appreciate the opportunity to comment on the Industrial Stormwater General Permit (ISGP). As the North Sound Baykeeper with RE Sources for Sustainable Communities, I concur with comments provided to you by Richard Smith of Smith & Lowney.

I, too, thank you for the hard work that went into putting this ISGP together. There remain some aspects of the ISGP with which I am still disappointed. The most notable failings of this recent permit are the lack of numeric effluent limitations, and the long time timeframe -- 2009-- prior to the implementation of numeric limits. Additionally, the importance of Ecology's ability to adequately implement and enforce the ISGP cannot be overlooked. The mechanism detailing how this will happen needs to be elucidated.

In addition to comments provided by Smith & Lowney, I provide these additional specific comments by section:

S3C1b:

- ① Where chlorinated, water from fire protection system flushing, maintenance, and testing should be dechlorinated prior to discharge.

S3C1e:

- ② Irrigation drainage water is of concern due to use of fertilizers and pesticides. It should be tested and/or treated depending on its condition, prior to discharge.

S3c2f:

- ③ Discharges associated with fire-fighting "activities" should not be exempt, except in the case of emergencies. Routine activities should not be exempt.

S3.E.

④ The reasoning for exclusion from permit requirements for waters subject to 303d listing or TMDL requirements after the issuance date of the permit does not appear valid. If a water body becomes listed under 303d or has a completed TMDL, it appears that applying the rules associated with those processes should take precedence. If stormwater is a significant component of ongoing pollution, its regulation should not be exempted due to coverage under the ISGP.

S3F:

⑤ It appears that mixing zones can be authorized when certain conditions are met but without a site inspection. It appears prudent that Ecology would authorize mixing zones only with a site inspection.

Thank you again for consideration of these comments and for your work in helping protect our environment.

Sincerely,

Wendy Steffensen  
North Sound Baykeeper  
RE Sources